



1010270

MAR 04 1994

HRP-8J

Mr. David E. Long  
Pollution Control Engineer  
Northwestern Steel and Wire Company  
121 Wallace Street  
Sterling, Illinois 61081

Re: Groundwater Monitoring  
Corrective Measures  
ILD 005 263 157

Dear Mr. Long:

We have reviewed your letter of February 5, 1994, in which you propose replacing monitoring well MW-6 (which was damaged during loading activities) by a new replacement well MW-6R, to be located slightly west of the present location. Your request is hereby approved, subject to the caveats that the well conforms to the applicable requirements in the approved RCRA Facility Investigation Workplan, that the installation and development of the well be documented, and that a copy of the documentation be sent to the U.S. Environmental Protection Agency. We have also determined that the replacement does not constitute an action requiring a formal permit modification, as its purpose is solely to replace a well already required in the permit.

In your letter, you identify a problem with the analysis of vinyl chloride in the sample from monitoring well MW-4. As we understand it, the levels of vinyl chloride in the sample require that the sample be diluted. As a result of the dilution process, it is believed that some of the vinyl chloride volatilizes out of the sample, and thus, the reported concentration is likely to be underestimated. As vinyl chloride is the constituent of most interest in the contaminant plume, it is important to obtain the most accurate results possible. Therefore, we request that you discuss the problem with the analytical laboratory to see if they can use a different method, or if they can modify their present method, so as to analyze for vinyl chloride without having to dilute the sample. Please submit a summary of your discussions, and identify any changes that can be done to improve the accuracy.

Please contact Gale Hruska of my staff, at (312) 886-0989, if you have any questions regarding this matter.

Sincerely yours,

George J. Hamper, Chief  
Illinois Section  
RCRA Permitting Branch

GRH  
3-4-94

GRH  
3/4/94

P-186



**STATEMENT OF BASIS/FINAL DECISION AND  
RESPONSE TO COMMENTS SUMMARY**REGION V  
ID# 3157**Northwestern Steel and Wire Company**Sterling, IL  
(signed March 22, 1993)**Facility/Unit Type:** Industrial landfill**Contaminants:** Cis-1,2-Dichloroethene (cis-1,2-DCE); Trichloroethylene (TCE); Vinyl Chloride**Media:** Ground water, sediments**Remedy:** Institutional controls for ground water, ground-water monitoring, natural attenuation**FACILITY DESCRIPTION**

On September 27, 1987, EPA issued a RCRA permit to the Northwestern Steel and Wire Company (NW Steel) for a facility located in Sterling, IL. The permit, pursuant to Section 3004 of HSWA, required NW Steel to conduct a RFI for a SSMU at the Sterling facility identified as the pre-RCRA Landfill.

The pre-RCRA Landfill covers an area of approximately 13.5 acres, is 8 to 10 feet deep, and is located 200 yards from the Rock River. The landfill was in active use from 1974 until 1980. NW Steel identified the primary materials placed in the landfill as electric furnace slag, emission control dust/sludge from the production of steel in electric furnaces, and lime-neutralized pickle liquor sludge. Other materials placed in the landfill were mill scale, brick, and wood.

During the RFI, sampling was conducted of soils in the vicinity of the landfill, of surface water pathways leading from the landfill site to the Rock River, and of ground-water pathways which would come in contact with any leachate generated in the landfill. A plume of ground-water contamination approximately 600 feet in width and extending from the southern face of the landfill to the river was discovered during the sampling. The ground water was found to contain TCE, DCE, and vinyl chloride. On August 20, 1990, based on the results of the RFI, EPA ordered NW Steel to conduct a CMS to evaluate cleanup alternatives. NW Steel then performed

the CMS.

**EXPOSURE PATHWAYS**

Human exposure could occur via three pathways. First, if the soil and fill in the pre-RCRA Landfill were disturbed, there could possibly be exposure through contact with or ingestion of the soil and fill. Secondly, if ground water were extracted from the plume of contamination, contact with or ingestion of the water could result in exposure. Finally, contact with the water or sediments in the river, either directly by humans or indirectly by the ingestion of plants and animals exposed to the constituents, could occur. Non-controllable pathways of concern involve releases to the river which may result in inhalation of air containing vinyl chloride and dermal exposure to recreational users of the river.

**SELECTED REMEDY**

The selected remedy consists of restrictions on the usage of ground water that could be affected by the contamination from the landfill, restrictions on activities that would disturb the soils or fill material in the landfill, periodic monitoring of the ground water that could be affected by the contamination from the landfill, and provisions to implement additional corrective measures if any significant increases in contaminant levels occur. The remedy is



## CONTAMINATION DETECTED AND CLEANUP GOALS

Media	Estimated Volume	Contaminant	Maximum Concentration (µg/l)	Action Level	Cleanup Goal*	Point of Compliance
sediment	N/A	cis-1,2-OCE Vinyl Chloride	4 18	70 ppb 2 ppb	70 ppb 2 ppb	Landfill boundary of the plume until it reaches the river.
ground water	N/A	cis-1,2-DCE Vinyl Chloride	900 520	70 ppb 2 ppb	70 ppb 2 ppb	
		TCE	5.5	5 ppb	5 ppb	

\* Cleanup goal is the Maximum Contaminant Level federally enforceable under the Safe Drinking Water Act.

based on the finding that, under present conditions, the releases to the ground water at the site do not present a significant threat to either human health or the environment, and that natural degradation and attenuation of the constituents will lead to a safe cleanup of the release.

The total cost of the selected remedy is estimated at approximately \$179,575 (Capital costs \$28,125 and O&M costs \$151,450).

### INNOVATIVE TECHNOLOGIES CONSIDERED

The following innovative technologies were considered:

- In-situ vapor extraction
- In-situ bioreclamation
- Fix film bioreactors
- Oxidation with UV photolysis.

### PUBLIC PARTICIPATION

The public comment period extended from January 21, 1993 through March 8, 1993. No comments were received and no public hearing was requested.

### NEXT STEPS

NW Steel will continue to do quarterly groundwater monitoring of the wells along the perimeter of the landfill for a year, and will report the results to EPA. If no significant increase in the concentration of hazardous constituents is found during the quarterly monitoring period, semiannual monitoring will be conducted until there are no releases above MCLs detected.

### KEY WORDS

ground water, sediments; ingestion, dermal contact, inhalation; VOCs, heavy metals; institutional controls, monitoring, natural attenuation

### CONTACT

Gale Hruska  
U. S. EPA, Region V  
RCRA Program Management Branch (HRM-8J)  
77 W. Jackson Boulevard  
Chicago, IL 60604  
(312) 886-0989





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DEC 26 1991

HRP-8J

Mr. Ken Brown  
Environmental Monitoring Laboratory/EMSL-LV  
P.O. Box 93478  
Las Vegas, Nevada 89193-3478

RE: Corrective Measures Study  
Northwestern Steel & Wire  
Sterling, Illinois  
ILD 005 263 157

Dear Mr. Brown:

We are requesting technical assistance from your laboratory to aid us in the review of the corrective measures study submitted by Northwestern Steel and Wire Company. Our request for your services is necessary because there are documented releases of hazardous constituents at the site, and the Region V Permitting Branch risk assessment expert has taken another position, so that we do not yet have another person in the RCRA Permitting Branch technically qualified to perform the risk assessment review of the study.

By way of background, Northwestern Steel & Wire Company completed a RCRA Facility Investigation of a closed landfill at their facility, as was required by their RCRA permit. The study documented a release of vinyl chloride and cis-1,2-dichloroethylene into the groundwater from the landfill. The groundwater flow is to the Rock River, which is about 500 feet away from the landfill. Concentrations in the well-defined plume were measured up into the range of several hundred parts/million. Measurements in the sediments of the river were only a few parts/billion. As the result of a risk analysis, which places the total risk from the release at  $4 \times 10^{-7}$ , the company is proposing a continuing monitoring program, but no corrective action as such.

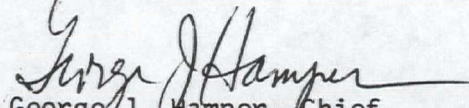
We would like the laboratory to review the Corrective Measures Study, with particular emphasis on the validity of the risk assessment. In particular, with respect to human health and the environment, is the analysis complete and accurate, and does it support the company's proposed no-action alternative? Is the no-action alternative compatible with U.S. EPA policy? If there are any problems with the study, we would need to have them defined so as to be able to make a supportable decision on the corrective action. If there is a better alternative than the no-action one, then it should be identified and reasons provided for the choice.

Telephone 8-545-2270  
Fax -2637



I am enclosing a copy of the 2 volumes constituting the corrective measures study. As we would like to take action on the corrective measure by this Spring, we would appreciate your comments within 60 days. Please contact Gale Hruska of my staff, at (312) 886-0989, if you have any questions, or require further information. We greatly appreciate your assistance.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "George J. Hamper", with a long horizontal flourish extending to the right.

George J. Hamper, Chief  
Illinois Section  
RCRA Permitting Branch

Enclosures





217/782-6762

Refer to: 1950500007 -- Whiteside County  
Northwestern Steel & Wire  
ILD005263157  
Subpart F

RECEIVED

NOV 14 1991

November 8, 1991

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Gale R. Hruska  
USEPA, Region V  
RCRA Activities  
230 South Dearborn  
Chicago, Illinois 60604

Dear Mr. Hruska:

The Agency has completed a review of the August 12, 1991 Corrective Measures Study. The following comments are provided:

1. The groundwater data provided as basis for risk assessment and corrective measure alternative determination is not adequate to identify any trends in groundwater quality. Specifically, the data set used comprised of only three sampling events: August and September of 1989 and April of 1991. Northwestern Steel & Wire (NSW) should utilize the complete data set available for the monitoring wells at the site.
2. The chosen remedy by NSW (Limited Action) does not consider the potential of a dramatic decrease in groundwater quality. Conversely, all calculations for risk assessment, an integral part of the alternative decision process, were based on the assumption that concentrations of hazardous waste or hazardous waste constituents in the groundwater has peaked.

Based on the data provided in the submittal, a favorable alternative would be the construction of a multi-layer cap and groundwater treatment using UV Photolysis.

3. The chosen target numbers for the three constituents (Trichloroethylene, 1,2-Dichloroethylene and Vinyl Chloride) are higher than concentration levels routinely set by the State's Clean-up Objectives Team. Considering the lack of a definitive plume characterization, the chosen target numbers should be reevaluated.
4. The corrective action method, to be used in the event that the trigger numbers are exceeded, has not been completely discussed. The CMS infers that UV Photolysis will be used, however not directly stated. In the event that the groundwater treatment method to be used in corrective action is identical to the method discussed in Section 4.5.4 (oxidation with UV Photolysis), the CMS should specifically state it.





Page 2

5. The effectiveness of UV Photolysis has not been demonstrated by NSW. Specifically, the results of the Spring 1991 bench test performed by Peroxidation Systems was not provided for review.
6. The use of PVC vapor extraction wells is not appropriate considering the constituents of concern and the amount of condensation to be generated by the process.

The Agency recommends stainless steel or equally inert construction material be used when volatile organic constituents are present.

7. The fate of treated groundwater in Alternative 4.5.5 (Activated Carbon) was not presented or considered.
8. The CMS does not discuss the effectiveness of creating a cone of depression in the groundwater surface in an effort to reduce the contact of groundwater with the waste. Considering the fact that NSW has identified the possibility of groundwater being in direct contact with the waste, technology to lower the water table should be evaluated.

If you have any questions regarding the above comments, feel free to contact Ken Lovett at 217/782-6761.

Very truly yours,

Kenneth W. Liss, Acting Manager  
Groundwater Assistance Unit  
Permit Section  
Division of Land Pollution Control

*KDL*  
KWL:KDL:sf/3392q,3-4

cc: Division File  
Northern Region  
Amy Dragovich  
Ken Lovett



# NORTHWESTERN

STEEL AND WIRE COMPANY

August 12, 1991

Mr. Gale R. Hruska  
RCRA Activities  
U.S. EPA, Region V  
P.O. Box A 3587

File D.3.4  
NORTHWESTERN  
STEEL & WIRE

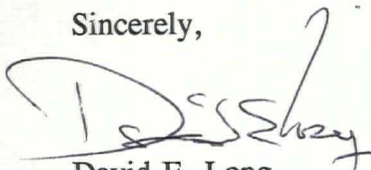
Re: Corrective Measures Study  
ILD 005263157

Dear Mr. Hruska:

This letter and the included report constitute Northwestern Steel and Wire Company's submission of the Corrective Measures Study and associated risk assessment due August 15, 1991 in accordance with the Work Plan approved by USEPA on November 8, 1990.

Please contact me if you have any questions or comments regarding this report.

Sincerely,



David E. Long  
Pollution Control Engineer

cc: Mr. Lawrence W. Eastep, IEPA

20480,025.23/0812913J.WP/3



# NORTHWESTERN

STEEL AND WIRE COMPANY

February 26, 1991

Mr. Gale Hruska  
RCRA Activities  
U.S. EPA, Region V  
P.O. Box A 3587  
Chicago, Illinois 60690-3587

RECEIVED

MAR 4 - 1991

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Re: Task I Report and Corrective Measures Study  
ILD 005263157

Dear Mr. Hruska:

Enclosed are several revised pages of the report entitled, "Task I: Identification and Development of Corrective Measures Alternatives." These changes reflect some questions you raised with Messrs. Robert W. Parsons and Michael Smith of Yates & Auberle, Ltd., our environmental consultants. Please note that on page 13 the reference to EPA (1979) should be Callahan (1979) even though this is an EPA publication. Pages 13-16, 47 and 48 in the original report should be removed and replaced with the enclosed pages.

Should you have additional questions, please call Robert Parsons or Michael Smith at (708) 571-2162.

Sincerely,



Robert W. Martin  
Vice President, Purchasing

Enclosures

916-516-2/0222914j.wp/3



February 5, 1991

Mr. Gale Hruska  
RCRA Activities  
US EPA Region V  
230 South Dearborn  
Chicago, Illinois 60604

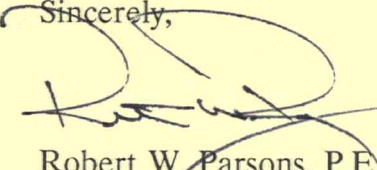
RE: Corrective Measures Study - Task I  
Identification and Development of Corrective Measures Alternatives  
ILD 005263157

Dear Mr. Hruska:

We are submitting on behalf of Northwestern Steel and Wire Company the enclosed report for the Identification and Development of Corrective Measure Alternatives at this pre-RCRA landfill. This report is submitted for your review and comments.

We are continuing to work on the other phases of the Corrective Measures Study in order to maintain the project schedule. I would like to schedule a meeting with you during the week of February 18, 1991 to discuss this report.

Sincerely,

  
Robert W. Parsons, P.E.  
Manager, Hazardous Material Services

cc: D. Long - Northwestern Steel and Wire  
R. Martin - Northwestern Steel and Wire



2-8-91

*I spoke to R. Parsons and related the few comments identified inside the submission. He will send some revised pages.*  
*G. Hruska;*

FEDERAL EXPRESS - NEXT DAY - AM DELIVERY

916-516-2/0204911b.wp/6





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HR-13

JAN 03 1991

Mr. Robert W. Martin  
Vice President, Purchasing  
Northwestern Steel and Wire Company  
121 Wallace Street  
Sterling, Illinois 61081

Re: CMS Workplan  
ILD005263157

Dear Mr. Martin:

We have received and reviewed your request of December 4, 1990, regarding an extension of the time allowed for submission of a draft corrective measures study report. We agree that performing required fieldwork in December 1990 and February 1991 is likely to be difficult, if not impracticable, due to the weather at that time of year. Therefore, we accept the revised workplan and we are extending the due date for the submission of the draft corrective measures study report from May 8, 1991 until August 15, 1991.

If you have questions regarding this matter, please contact Gale Hruska of my staff at (312) 886-0989.

Sincerely,

George J. Hamper  
Chief, Illinois Section  
RCRA Permitting Branch

RCRA PERMITS	TYP.	AUTH.	IL CHIEF	IN. CHIEF	ML CHIEF	MN/WI CHIEF	OH. CHIEF	RPB CHIEF	O.R. A.D.D.	WMD DIR
		JEH	JEH							
		12-29-90	12/24/90							



# NORTHWESTERN

STEEL AND WIRE COMPANY

December 4, 1990

Mr. Gale R. Hruska  
Environmental Scientist  
U.S. Environmental Protection Agency  
RCRA Permitting Branch, Region 5  
230 South Dearborn, 5HR-13  
Chicago, Illinois 60604

RECEIVED  
DEC 18 1990  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

RE: Northwestern Steel and Wire, CMS Workplan  
ILD 005263157

Dear Mr. Hruska:

We received your approval of our previously submitted RCRA Corrective Measures Study (CMS) Workplan on November 12, 1990, and have begun work on Task 1 of the CMS. A Task 1 report will be submitted to EPA for review as soon as it is completed. Work on the CMS will continue with Task 2 while we await EPA comment.

The purpose of this letter is to request a change in the completion schedule for the CMS. As discussed with you by our representatives on November 28, 1990, Northwestern Steel and Wire anticipates conducting additional field investigation at the pre-RCRA landfill site. These investigations require the collecting of additional information necessary to evaluate remedial alternatives for the site. In order to meet the schedule required by EPA, this field work would be conducted between December 15, 1990 and February, 1991. Field work is impractical during this period because of anticipated adverse weather conditions.

We request, therefore, that the Task 2 schedule be extended to allow the field work to be conducted between March 15 and May 15, 1991. The results of the field investigation would be used to complete Task 2 by June 15, 1991. Tasks 3 and 4 would then proceed as planned and a draft final CMS report will be submitted by August 15, 1991. A revised CMS schedule is attached.

In addition, because the approval letter was received near the middle of the month, we request that the monthly progress reports be submitted to EPA on the 15th of each month. The first monthly report will be submitted on December 15, 1990.



*Northwestern Steel and Wire Company / Sterling, Illinois*

We look forward to receiving your approval of these requests. If you have any questions, please contact either David Long or myself at (815) 625-2500.

Sincerely,



Robert W. Martin  
Vice President,  
Purchasing

CERTIFIED MAIL - RETURN RECEIPT REQUESTED



NORTHWESTERN STEEL & WIRE COMPANY  
CORRECTIVE MEASURES STUDY

Year		1990		1991											
Month		Nov	Dec	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
Task Number	Task Description														
1	Identification of CM Alternatives														
2	Evaluation of CM Alternatives														
	ACL/Risk Assessment														
	Field Investigation														
	Bench Testing														
3	Recommendation of CM														
4	Draft CMS Report														
	EPA Review														
5	Final CMS Report														





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 5**

**230 SOUTH DEARBORN ST.**

**CHICAGO, ILLINOIS 60604**

**NOV 08 1990**

**REPLY TO THE ATTENTION OF:**

**5HR-13**

Certified Mail P246372966  
Return Receipt Requested

Mr. Robert W. Martin  
Vice President  
Northwestern Steel and Wire Company  
121 Wallace Street  
Sterling, Illinois 61081

Re: CMS Workplan  
ILD 005263157

Dear Mr. Martin:

We have reviewed the RCRA Corrective Measures Study (CMS) Workplan which you submitted with your letter of September 21, 1990. The workplan is hereby approved, subject to the following modification to the plan.

The workplan divides the CMS into five tasks. The first three tasks consist of the implementation of the study, with Task 4 consisting of preparation of a draft CMS report, and Task 5 with the preparation of the final report. After each of the first three tasks is completed, the original workplan provides for a 15-day interval in which the U.S. EPA would review and approve a report on the individual task. We believe that a review is not necessary until the completion of Task 4, when the draft final CMS report is submitted, and that elimination of this activity will result in the shortening by 45 days of the CMS. Therefore, the schedule in Section 6 is hereby modified to omit formal review by the U.S. EPA of Tasks 1-3. The first required submission (other than the monthly reports) will be the draft CMS report, to be submitted within 180 days of your receipt of this workplan approval. The U.S. EPA will, at your request, review any portion of the CMS, prior to the submission of the draft final report, but this review will not affect the draft final report scheduled due date.

If you have questions regarding this matter, please contact Gale Hruska of my staff, at (312) 886-0989.

Sincerely,

**ORIGINAL SIGNED BY/**  
**KARL E. BREMER**

Karl E. Bremer, Chief  
RCRA Permitting Branch

cc: Lawrence Eastep, IEPA



● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. (Extra charge) 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to:  
Robert W. Martin  
Vice President, Purchasing  
Northwestern Steel and Wire Company  
121 Wallace Street  
Sterling, Illinois 61081

4. Article Number  
P246372966

Type of Service:

- |   |  |
|---|--|
| <input type="checkbox"/> Registered           | <input type="checkbox"/> Insured                           |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD                               |
| <input type="checkbox"/> Express Mail         | <input type="checkbox"/> Return Receipt<br>for Merchandise |

Always obtain signature of addressee  
or agent and DATE DELIVERED.

5. Signature — Address

X

6. Signature — Agent

X

NW Steel & Wire

7. Date of Delivery

11-5-80

8. Addressee's Address (ONLY if  
requested and fee paid)



5HR-JCK-13/Gale Hruska;jhg 11/1/90 Draft  
11/6/90 Final

RCRA PERMITS	TYP.	AUTH.	PL. CHIEF	ENV. CHIEF	WIL. CHIEF	WATER CHIEF	HAZ. CHIEF	RPB	O.R. A.D.D.	DATE
INIT. DATE	JH/B 11-7-90	GRK 11-7-90	YH 11/7/90					X/S 11/6/90		

*Handwritten notes:*  
JH/B 11/7/90  
YH 11/7/90  
X/S 11/6/90





## Northwestern Steel and Wire Company

121 WALLACE STREET • STERLING, ILLINOIS 61081

Telephone 815/625-2500 • TWX 910-642-3894

September 21, 1990

Mr. David A. Ullrich, Acting Director  
Waste Management Division  
U.S. EPA, Region V  
230 South Dearborn Street  
Chicago, Illinois 60604

Re: Corrective Measure Study Work Plan, Pre-RCRA Landfill  
ILD005263157

Dear Mr. Ullrich:

Northwestern Steel and Wire received your letter dated August 20 approving our RFI report on the pre-RCRA landfill. In that letter, you requested that a Corrective Measures Study (CMS) be submitted within 90 days. An alternative was presented that an extension be requested by submitting for EPA approval a work plan for performing the CMS, complete with time and task specific milestones.

It is our opinion that 90 days is not adequate to perform a comprehensive CMS, including evaluation of no further action and Alternative Concentration Limits, as is our intention. Therefore, we are submitting a CMS work plan for your review and approval, including a schedule for completion of the CMS.

We look forward to your review, any questions and approval of this ambitious program.

Sincerely,

Robert W. Martin  
Vice President, Purchasing

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

400-002/0914906b.wp/6

RECEIVED  
SEP 26 1990  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

David Long. X2451

P94





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HR-13

SEP 11 1990

Mr. David E. Long  
Pollution Control Engineer  
Northwestern Steel and Wire Company  
121 Wallace Street  
Sterling, Illinois 61081

RE: Corrective Measures Study  
ILD 005 263 157

Dear Mr. Long:

The purpose of this letter is to correct an error in our letter of August 20, 1990, requesting that Northwestern Steel and Wire perform a corrective measures study (CMS). As was pointed out by Mr Gerald Zimphir of Yates and Auberly, the letter incorrectly identifies one of the hazardous constituents released from the Pre-RCRA Landfill as 1,2-Dichloroethane. The correct constituent should be 1,2-Dichloroethene (which is also identified as 1,2-Dichloroethylene).

This letter hereby amends our letter of August 20, 1990, to replace all references to 1,2-Dichloroethane by 1,2-Dichloroethene. In addition the action level in paragraph two, and the MCL in Item a., of 5ppb should be replaced by a value of 70 ppb. This value corresponds to the proposed MCL for CIS 1,2-Dichloroethylene as given in Drinking Water Regulations and Health Advisories, Office of Drinking Water, U.S. Environmental Protection Agency, April 1990.

If you have any questions regarding this matter, please contact me at (312) 886-0989.

Sincerely

*Gale R Hruska*

Gale R. Hruska  
Environmental Scientist

P.91

5HR-JCK-13/Gale Hruska 9/6/90 Draft  
9/11/90 Final

See P-82

RCRA PERMITS	TYP.	AUTH.	IL CHIEF	IN. CHIEF	ML CHIEF	MN/WI CHIEF	OH. CHIEF	RPB CHIEF	O.R. A.D.D.	WFO ON
INIT. DATE	9/11/90	9/11/90	9/12/90							



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: June 15, 1987

SUBJECT: Meeting with Northwestern Steel and Wire Company (Sterling, Illinois, ILD 005263157) Regarding Draft Corrective Action Permit

FROM: Gale Hruska  
TPS/WMD

*GRA 6/23/87*

TO: Files

Dale VanDeVelde (Northwestern Steel and Wire Company) and William Auberly (Yates and Auberly Consultants) came in to discuss aspects of their draft corrective action permit. James Mayka, David Wilson, and Gale Hruska represented U.S. EPA. Prior to the discussion we reiterated to them that this discussion would be limited only to generic aspects of the permit (such as clarification of what is meant by specific provisions), and that concerns and comments specifically related to the Northwestern Steel and Wire facility must be addressed in a written response during the public comment period.

The first question related to the effective and expiration dates of the permit. No dates were specified in either the State or U.S. EPA permits. I told them that our dates would correspond to the dates IEPA chooses, and that IEPA had not yet given us this information. By regulation, our permits cannot exceed 10 years in duration, but they can be shorter.

The second question related to the need for an extensive corrective action investigation when there is no available information to suggest that there is any threat to the environment. Our response was that HSWA requires U.S. EPA to address corrective action for continuing releases from facilities seeking RCRA permits. Since the wastes which went into the old landfill are the same wastes which are going into the new landfill which requires a permit, and since the old landfill was not an engineered unit, and since there is no data which demonstrates either the existence or nonexistence or releases, a study must be undertaken. It was stressed that such studies would proceed in phases, and that if the first phase demonstrated no contamination than no further action would be necessary.

The facility wanted to know if they could propose a Pre-phase I investigation to determine the presence or absence of releases. They claim that the Phase I investigation proposed in the permits Scope of Work work be very expensive and present some logistical problems because of the location of the old landfill. Our response is that they could suggest modifications to any part of the corrective action permit. Since there are no corrective action regulations, we have the ability to modify the Scope of Work. Our decision to accept or reject modification would be based on its conformity with headquarters guidance, its timeliness, and its protectiveness of the environment. It was stressed that we could not approve any modifications at this meeting, and that the modifications must be sent in during the draft permit public comment period.

cc: Tom Kenney, ORC

Dale VanDeVelde, Northwestern Steel and Wire Company



June 15, 1987

Meeting with Northwestern Steel and Wire Company (Sterling, Illinois, ILD 005263157) Regarding Draft Corrective Action Permit

Gale Hruska  
TPS/WMD

GRA 6/23/87

Files

Dale VanDeVelde (Northwestern Steel and Wire Company) and William Auberly (Yates and Auberly Consultants) came in to discuss aspects of their draft corrective action permit. James Mayka, David Wilson, and Gale Hruska represented U.S. EPA. Prior to the discussion we reiterated to them that this discussion would be limited only to generic aspects of the permit (such as clarification of what is meant by specific provisions), and that concerns and comments specifically related to the Northwestern Steel and Wire facility must be addressed in a written response during the public comment period.

The first question related to the effective and expiration dates of the permit. No dates were specified in either the State or U.S. EPA permits. I told them that our dates would correspond to the dates IEPA chooses, and that IEPA had not yet given us this information. By regulation, our permits cannot exceed 10 years in duration, but they can be shorter.

The second question related to the need for an extensive corrective action investigation when there is no available information to suggest that there is any threat to the environment. Our response was that HSWA requires U.S. EPA to address corrective action for continuing releases from facilities seeking RCRA permits. Since the wastes which went into the old landfill are the same wastes which are going into the new landfill which requires a permit, and since the old landfill was not an engineered unit, and since there is no data which demonstrates either the existence or nonexistence or releases, a study must be undertaken. It was stressed that such studies would precede in phases, and that if the first phase demonstrated no contamination than no further action would be necessary.

The facility wanted to know if they could propose a Pre-phase I investigation to determine the presence or absence of releases. They claim that the Phase I investigation proposed in the permits Scope of Work work be very expensive and present some logistical problems because of the location of the old landfill. Our response is that they could suggest modifications to any part of the corrective action permit. Since there are no corrective action regulations, we have the ability to modify the Scope of Work. Our decision to accept or reject modification would be based on its conformity with headquarters guidance, its timeliness, and its protectiveness of the environment. It was stressed that we could not approve any modifications at this meeting, and that the modifications must be sent in during the draft permit public comment period.

cc: Tom Kenney, ORC

Dale VanDeVelde, Northwestern Steel and Wire Company

INIT. DATE	TYP.	AUTH.	IL. CHIEF	IN. CHIEF	MI. CHIEF	CHIEF	CHIEF	CHIEF	SWB CHIEF	WMD DIR
6/23/87	GRA	GRA	6/23/87	30						





UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

~~CAR~~  
~~SAS~~  
due 7-18-85

REPLY TO ATTENTION OF:

JUN 11 1985

RECEIVED

5HS-13

JUN 14 1985

IEPA-DLPC

Lawrence W. Eastep, Manager  
Permit Section, DLPC  
Illinois EPA  
2200 Churchill Road  
Springfield, Illinois 62706

RE: Corrective Action Response Review  
Northwestern Steel and Wire Company  
ILD 005263157

Dear Mr. Eastep:

Enclosed is a copy of information we received from the referenced facility, addressing the "continuing release" provisions of the Hazardous and Solid Waste Amendments of 1984. Please review this information, and complete the enclosed form entitled "RCRA Facility Review for Solid Waste Management Units." We also encourage you to provide us any and all additional information that is pertinent to a consideration of continuing releases at this facility. We will take no final actions concerning this facility without your full participation in the decision-making process.

We ask that you return the completed form, plus any additional information to us (1) within two weeks of your receipt of this letter, for facilities which have indicated "no releases", and (2) within four weeks for facilities which have indicated prior or continuing releases of any kind.

Please feel free to call the previously identified permit writer during the progress of your review with any questions or comments.

Sincerely yours,

Edith M. Ardiente, P.E.  
Chief, Technical Programs Section

Enclosure(s)



JUN 11 1985

SHS 12

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Permit Section, DLPC  
Illinois EPA  
2200 Churchill Road  
Springfield, Illinois 62706

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Chief, Technical Programs Section

Enclosure(s)

SHS-12:H.Witschonke:6/5/85

INITIALS	TYPYST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WDB CHIEF	WWD CHIEF
	<i>Ed</i> <i>6/5/85</i>		<i>amb</i> <i>6/5/85</i>			<i>z.k.</i> <i>6/10/85</i>		
DATE						<i>gan</i> <i>6/10/85</i>		